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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

January 5, 2004

Ms. Marlene Dortch, Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE #110
Washington, D.C. 20002

Dear Secretary Dortch,

Enclosed please find our comments in reference to "*The Use of Separate Antennas to Initiate Digital FM Transmissions*", FCC DA 03-3898, MM Docket No. 99-325, December 8, 2003.

Thank you for consideration of our opinions and suggestions.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Proctor", is written over a horizontal line.

Deborah S. Proctor
General Manager

at5

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In Re: The Use of Separate) FCC DA 03-3898
Antennas to Initiate) MM Docket No. 99-325
Digital FM Transmissions) December 8, 2003

Comments of Educational Information Corporation

The commentor operates noncommercial educational station WCPE in Raleigh, North Carolina, and feels well versed in the matter of FM broadcast transmission, propagation, and reception from a practical and theoretical standpoint.

Due to the expenses inherent in conversion to digital broadcasting technology, especially in the cast of non-commercial FM licensees, we ask that the Commission allow separate antennas for non-commercial licensees in cases where the analog FM antenna and the proposed digital FM antenna are mounted on the same tower, and the digital FM antenna is at an elevation equal to 50% or more of the Height Above Average Terrain of the analog FM antenna (as opposed to 70% as proposed for both commercial and non-commercial entities).

Other proposals envision separate antennas within three seconds of longitude and latitude of the main antenna and do not foresee any technical problems therefrom. This proposal requests a slightly increased vertical separation, but with no difference in latitude or longitude; therefore, we do not envision any technical degradation -- if anything, we feel that antennas co-located on the same tower, regardless of height, can be expected to perform equal to or better than antennas located within the "volume bounds" proposed by other commentators.

This slightly increased latitude for public radio broadcasters will give non-commercial entities increased flexibility in their ability to utilize, lease, or modify their current transmission facilities, and would help speed the digital transition for public broadcasters. Moreover, this additional flexibility would not likely have any significant adverse effect on the performance of the digital service.

Respectfully Submitted January 5, 2004

(s) 

Deborah S. Proctor, BSEE, CPBE
President, EIC